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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

EDWIN YOSHIHIRO FUJINAGA and MRI
INTERNATIONAL, INC.,

Defendants.

and

CSA SERVICE CENTER, LLC THE
FACTORING COMPANY, JUNE FUJINAGA,
and THE YUNJU TRUST,

Relief Defendants.

CASE NO. 2:13-cv-01658-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
RECEIVER'S APPLICATION FOR AN
ORDER TO SHOW CAUSE WHY
FORMER COUNSEL FOR DEFENDANT
SHOULD NOT BE COMPELLED TO
RETURN ESTATE FUNDS
(FIRST REQUEST)**

IT IS HEREBY STIPULATED AND AGREED by and between Former Defense
Counsel for relief defendant June Fujinaga and the Yunju Trust, Michael V. Cristalli, Esq., and
Dominic P. Gentile, Esq., of the law firm of Clark Hill, PLLC and Counsel for the Receiver,
Robb Evans & Associates, LLC, Michael F. Lynch, Esq., of the law firm of Lynch Law Practice,
PLLC, hereby respectfully submit this Stipulation and Order Extending Time for Former
Defense Counsel for relief defendant June Fujinaga and the Yunju Trust to Respond to

1 Receiver's Application for an Order to Show Cause Why Former Counsel For Defendant Should
2 Not Be Compelled To Return Estate Funds. This Stipulation is made in accordance with LR 6-1,
3 LR 6-2, and LR II 7-1 of the Local Rules of this Court. This is the first request for an extension
4 of time to file a response to Receiver's Application for an Order to Show Cause Why Former
5 Counsel for Defendant Should Not Be Compelled To Return Estate Funds.

6 Receiver's Application for an Order to Show Cause Why Former Counsel for Defendant
7 Should Not Be Compelled To Return Estate Funds [ECF 556] was filed on March 31, 2020. The
8 Response to Receiver's Application is due April 14, 2020.

9 Upon agreement by and between all the parties, the undersigned respectfully requests that
10 this Court grant an extension of time in which the Response to Receiver's Application for an
11 Order to Show Cause Why Former Counsel for Defendant Should Not Be Compelled To Return
12 Estate Funds currently due April 14, 2020 be extended for a period of seven (7) days up to and
13 including April 21, 2020.
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1 The reason for this request is that the COVID 19 emergency and related limitations have
2 significantly hampered Clark Hill and Former Defense Counsel's ability to complete their
3 Responses to Receiver's Application.

4 DATED this 14th day of April, 2020.

DATED this 14th day of April, 2020.

5 CLARK HILL, PLLC

LYNCH LAW PRACTICE, PLLC

6
7 /s/ Mark S. Dzarnoski, Esq.

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13 *Former Defense Counsel June Fujinaga and*

The Yunja Trust

/s/ Michael F. Lynch, Esq.

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3613 S. Eastern Ave.

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Tel: (702) 684-6000

*Attorneys for the Receiver, Robb Evans &
Associates, LLC*

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16 **IT IS SO ORDERED:**

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19 UNITED STATES DISTRICT JUDGE

20 DATED: April 15, 2020